insmore&Shohl



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August 4, 2010

AUG 0 5 2010

via Federal Express

Jeff Derouen **Executive Director** Kentucky Public Service Commission 211 Sower Blvd. P. O. Box 615 Frankfort, KY 40601

PUBLIC SERVICE COMMISSION

West Virginia PCS Alliance's Certification of Federal Universal Service Re: Funding for Eligible Telecommunications Carriers

in the Commonwealth of Kentucky, Administrative Case No. 381

Dear Mr. Derouen:

Enclosed for filing with the Public Service Commission of the Commonwealth of Kentucky (the "Commission") in the above-referenced case is one original and ten (10) copies of the Annual Certification of West Virginia PCS Alliance LC (d/b/a "NTELOS") Regarding Use of Federal Universal Service Support.

Please also note the enclosed additional copy of the document to be file-stamped. Please filestamp the additional copy and return it to me in the enclosed, self-addressed, pre-paid envelope.

Thank you, and if you have any questions with regard to this matter, please call me.

Very truly yours,

DINSMORE & SHOHL LLP

Holly C. Wallace

HCW/rk Enclosure

cc: Amber Benson

135689 1 35828-1

> 1400 PNC Plaza, 500 West Jefferson Street Louisville, KY 40202 502.540.2300 502.585.2207 fax www.dinslaw.com

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

AUG 0 5 2010

PUBLIC SERVICE COMMISSION

Certification of Federal Universal)	
Service Funding for Eligible)	Administrative Case No. 381
Telecommunications Carriers in the)	
Commonwealth of Kentucky)	

ANNUAL CERTIFICATION OF WEST VIRGINIA PCS ALLIANCE (NTELOS) REGARDING USE OF FEDERAL UNIVERSAL SERVICE SUPPORT

West Virginia PCS Alliance (d.b.a. "NTELOS"), hereby submits the information requested by the Commission in Administrative Case No. 381 as well as the additional data requested in the NTELOS ETC Designation Order. NTELOS was granted Eligible Telecommunications Carrier designation in Kentucky on October 24, 2006 in Case 2006-00312. The Study Area Code (SAC) for NTELOS is 269010. NTELOS is a Non-Rural, Competitive carrier.

1) Certify that ETC will use universal service funds received in 2011 only for the provision, maintenance and upgrading of facilities and services for which such support is intended.

Included as Exhibit A is the Affidavit of Robert L. McAvoy certifying the use of the federal high cost support that will be received by NTELOS in 2011.

2) Provide progress reports on the ETC's five-year service quality improvement plan.

Attached as Exhibit B is the NTELOS five-year plan demonstrating the use of universal service support received for ETC designated areas in Kentucky. NTELOS received \$61,897 for 2009 high-cost universal service support for the Commonwealth of Kentucky.

3) Detail the number of requests for service from potential customers within its service areas that were unfulfilled for the past year.

NTELOS had no unfulfilled service requests in its service areas in 2009.

4) Detail the number of complaints per 1,000 handsets or lines;

For 2009, NTELOS had an average of 15.79 trouble tickets on a monthly basis per 1,000 customers.

Respectfully submitted,

Holly C. Wallace

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COUNSEL TO WEST VIRGINIA PCS ALLIANCE (NTELOS)

EXHIBIT A AFFIDAVIT OF ROBERT L. MCAVOY

AFFIDAVIT OF ROBERT L. MCAVOY IN SUPPORT OF WEST VIRGINIA PCS ALLIANCE, L.C.'s USE OF FEDERAL UNIVERSAL SERVICE SUPPORT

STATE OF VIRGINIA

CITY OF WAYNESBORO

- I, Robert L. McAvoy, declare as follows:
 - I am an officer of *West Virginia PCS Alliance*, *L.C.* and am authorized to give this affidavit on its behalf. This affidavit supports the Kentucky Public Service Commission's ("Commission") certification of the use of federal universal service funds for *2011* as required by 47 C.F.R [§ 54.313/§ 54.314]. NTELOS anticipates receiving \$62,000 in high-cost support in 2011.
 - 2) Under 47 C.F.R. [§ 54 313/§ 54.314], the Commission is required to submit an annual certification to the Federal Communications Commission ("FCC") and the Universal Service Administrative Company ("USAC"), certifying that rural and non-rural incumbent local exchange carriers and/or eligible telecommunications carriers serving lines in the service area of a rural and non-rural incumbent local exchange carrier within the Commonwealth of Kentucky will use federal high-cost universal service support in a manner consistent with section 254(e) of the Telecommunications Act of 1996 (the "Act"), 47 U.S.C. § 254(e) Absent such certification, such carriers will not receive universal service support. In order for carriers to receive federal support beginning January 1 of each year, the Commission's certification must be filed with the FCC and USAC by October 1 of the preceding year
 - 3.) In Administrative Case 381, the Commission directed all carriers to file verified statements under which each carrier in the Commonwealth of Kentucky that is subject to the Commission's jurisdiction and eligible to receive federal high-cost universal service

support, must certify to the Commission that federal universal service support funds to be received by that carrier for the succeeding year will be used only for the provision, maintenance and upgrading of facilities and services for which such support is intended.

4.) NTELOS Inc. hereby certifies that any federal high-cost universal service support West Virginia PCS Alliance, L.C. receives in 2011 will be used for the services and functionalities outlined in 47 C.F.R. § 54.101(a), and that it will only use the federal high-cost support it receives for the provision, maintenance and upgrading of facilities and services for which such support is intended, consistent with section 254(e) of the Act. NTELOS operates under Study Area Code (SAC) 269010 and is a Non-Rural, Competitive carrier.

FURTHER AFFIANT SAYETH NOT.

Senior Vice President- Wireless Engineering & Operations

NTELOS Inc.

Subscribed and sworn to before me this $\frac{\partial Q}{\partial t}$ day of $\frac{\partial Q}{\partial t}$, $\frac{\partial Q}{\partial t}$.

Notary Public

My commission expires: 531-14

EXHIBIT B

NTELOS FIVE-YEAR BUILD PLAN

WEST VIRGINIA PCS ALLIANCE - 5-YEAR BUILDOUT PLAN IN KENTUCKY

		2010			2011			2012			2013			2014		
		Signal	2010	2010	Signal	2011	2011	Signal	2012	2012	Signal	2013	2013	Signal	2014	2014
Wire Center	Name	Quality	Capacity	Coverage	Quality (Capacity (Coverage	Quality (Quality Capacity C	overage	Quality (Quality Capacity Co	Coverage	Quality (ality Capacity C	Coverage
ASLDKYXA	Ashland	\$0	\$39,154	\$163,052	\$0	\$48,198	\$180,255	\$0	\$46,782	\$193,480	80	\$45,445	\$193,040	\$0	\$44,184	\$193,275
CTBGKYXA	Catlettsburg		\$48,942	\$156,565	\$0	\$57,838	\$173,754	\$0	\$56,139	\$186,816	\$0	\$54,534	\$186,288	\$0	\$53,020	\$186,570
GYSNKYXA	Grayson		\$29,365	\$98,139	\$0	\$28,919	\$98,097	\$0	\$28,069	\$97,608	\$0	\$27,267	\$97,344	\$0	\$26,510	\$97,485
GNUPKYXA	Greenup		\$0 \$9,788	\$31,313	\$	\$9,640	\$31,299	\$0	\$9,356	\$31,136	80	\$9,089	\$31,048	\$0	\$8,837	\$31,095
RSSLKYXB	Russell		\$29,365	\$93,939	\$0	\$28,919	\$93,897	\$0	\$28,069	\$93,408	\$0	\$27,267	\$93,144	\$0	\$26,510	\$93,285
SSHRKYXA	South Shore		\$19,577	\$58,426	\$0	\$19,279	\$58,398	\$0	\$18,713	\$58,072	80	\$18,178	\$57,896	\$0	\$17,673	\$57,990

^{1 - 2010} new coverage sites are budgeted and we are currently targeting activation by end of year.

^{2 -} New sites beyond 2010 have not yet been approved

^{3 -} Capacity dollars are estimates based on the need for additional channel cards and carriers. In reality dollars will probably shift between years and markets (for example, we may spend more in 2010 in the Ashland wire center than our estimate but less in Greenup and vice-versa in 2011).

^{4 -} All capacity dollars are estimates and will vary based on actual usage and subscriber growth. 5 - 2012-2014 totals are dependent on 2010 growth and can/will fluctuate based on projects completed in 2011 or pushed to future years.